

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Ronald L. Harper, Debtor

**Case No. 22-50697-KMS
CHAPTER 13**

NOTICE

The undersigned counsel has filed papers with the court to Approve a Settlement, Compensation and Authorize Distribution of Proceeds.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the Application, or if you want the court to consider your views on the Application, then on or before 21 days, you or your attorney must:

File with the court a written request for a hearing at:

U.S. Bankruptcy Clerk
U.S. Bankruptcy Court
Thad Cochran United States Courthouse
501 E. Court St., Ste 2.300
Jackson, MS 39201

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

You must also mail a copy to the debtors' attorney:

The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
(601) 500-5533

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the Application and may enter an order granting that relief, which shall sustain this Application.

Date: April 15, 2025.

Signature: /s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469)
Jennifer A Curry Calvillo (MSBN 104367)
The Rollins Law Firm, PLLC
PO Box 13767
Jackson, MS 39236
601-500-5533
trollins@therollinsfirm.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Ronald L. Harper, Debtor

**Case No. 22-50697-KMS
CHAPTER 13**

**MOTION TO APPROVE SETTLEMENT, COMPENSATE SPECIAL COUNSEL AND
AUTHORIZE DISTRIBUTION OF PROCEEDS**

COMES NOW, Thomas C. Rollins, Jr., attorney for Pulaski Kherkher, PLLC (“Special Counsel”), and files this Motion to Approve Settlement, Compensate Special Counsel and Authorize Distribution of Proceeds and in support thereof, would show to this Honorable Court as follows, to-wit:

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).
2. That the Court has authority to allow this compensation and to pay the same as authorized by 11 U.S.C. § 330.

SETTLEMENT TERMS AND DISTRIBUTION OF PROCEEDS

3. On or about March 24, 2025, Pulaski Kherkher, PLLC was employed as Special Counsel (Dk# 60) representing Debtor in a 3M Combat Arms Earplugs case. That Debtor and Special Counsel agreed to a contingency fee of 40% plus expenses.
4. The personal injury claim is now settled in the gross amount of \$10,000.00. The settlement is fair and in the best interest of the Debtor and the bankruptcy estate.
5. Per the terms of the settlement, the settlement administrator should disburse the following:
 - a. Common Benefit Fund Deduction - \$900.00
 - i. Per the terms of the master Settlement Agreement, work performed for the benefit of all CAE Claimants are paid from a Common Benefit Fund. On

September 19, 2023, the United States District Court for the Northern District of Florida ordered 9% of every settlement award be set aside in the Common Benefit Fund. Attorney's fees are calculated as a percentage of the settlement after deducting Common Benefit Funds deductions.

- b. Attorney's Fees to Pulaski Kherkher, PLLC - \$2,105.00 (Reduced by \$1,535.00)
 - c. Expenses to Pulaski Kherkher, PLLC - \$1,673.19 (Reduced by \$500.00)
 - d. Administrative Costs - \$420.00
 - i. QSF Administration Fee - \$20.00
 - ii. Milestone Bankruptcy Coordination fee - \$400.00
 - e. Medical Lien Holdback - \$71.58
 - f. \$4,830.23 to the Chapter 13 Trustee
6. Special Counsel requests settlement approval and authority to pay the net settlement proceeds of \$4,830.23 to the Chapter 13 Trustee.

COMPENSATION OF SPECIAL COUNSEL

7. That Applicant has taken into consideration the factors outlined in *Johnson v. Georgia Highway Express, Inc.*, 499F.2d 714 (5th Cir. 1974), made applicable to proceedings in this Court by the decision in *In Re First Colonial Corp. of America*, 544 F. 2d, 1291 (5th Cir., *cert. denied*, 97 S. Ct. 1696 [1977]), in establishing a reasonable request for compensation. The fee is reasonable in light of the requirements that bankruptcy estates be administered as economically as possible and that all the services rendered are of a legal nature requiring the services of an attorney.

8. To a certain extent, other employment was precluded by services rendered in that at certain periods of the administration of this bankruptcy, the legal representation of the bankruptcy estate prevented the attorneys from working on other cases.

9. That the attorneys are duly licensed and authorized, practicing in Mississippi.

10. Debtor is entitled to a distribution from a settlement in the gross amount of \$10,000.00. Special Counsel requests attorney's fees of \$2,105.00, representing a discount from the agreed 40% of the gross settlement and \$1,673.19 as reimbursement of necessary expenses. That a 40% contingency falls within the range of customary attorney's fees for this type of matter.

WHEREFORE, the undersigned requests that this Motion be received and filed and that an Order be entered approving the foregoing settlement and distribution of proceeds, and prays for such other, further, and general relief to which the Special Counsel may be entitled.

Respectfully submitted,

Morgan & Morgan

BY: /s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469)
Jennifer A Curry Calvillo (MSBN 104367)
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Motion to Approve a Settlement, Compensate Special Counsel and Authorize Distribution of Proceeds with Debtor was forwarded on April 16, 2025 to:

By Electronic CM/ECF Notice:

Chapter 13 Case Trustee

U.S. Trustee

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469)

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:
RONALD L HARPER

CASE NO: 22-50697

**DECLARATION OF MAILING
CERTIFICATE OF SERVICE**

Chapter: 13

On 4/16/2025, I did cause a copy of the following documents, described below,
Notice and Application Approve Settlement

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 4/16/2025

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401
601 500 5533
trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:
RONALD L HARPER

CASE NO: 22-50697

**CERTIFICATE OF SERVICE
DECLARATION OF MAILING**

Chapter: 13

On 4/16/2025, a copy of the following documents, described below,
Notice and Application Approve Settlement

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 4/16/2025



Miles Wood
BK Attorney Services, LLC
d/b/a certificateofservice.com, for
Thomas C. Rollins, Jr.
The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING
NCRS ADDRESS DOWNLOAD
CASE 22-50697
SOUTHERN DISTRICT OF MISSISSIPPI
TUE APR 15 13-1-31 PST 2025

~~EXCLUDE~~

~~(U) FIRST TOWER LOAN LLC DBA TOWER LOAN
OF E~~

(P)MS DEPARTMENT OF HUMAN SERVICES
ATTN BENEFIT RECOVERY UNIT
PO BOX 352
JACKSON MS 39205-0352

~~EXCLUDE~~

~~(U) PULASKI KHERKHER PLLC~~

PULASKI KHERKHER PLLC
2925 RICHMOND AVE 1725
HOUSTON TX 77098-3136

ROBIN LAW PLLC
4435 E CHANDLER BLVD SUITE 200
PHOENIX AZ 85048-7651

ROBIN RAYNISH PLLC
6136 FRISCO SQUARE BLVD SUITE 400
FRISCO TX 75034-3251

TOYOTA MOTOR CREDIT CORPORATION
PO BOX 8026
CEDAR RAPIDS IA 52408-8026

~~EXCLUDE~~

~~US BANKRUPTCY COURT
DAN M RUSSELL JR US COURTHOUSE
2012 15TH STREET SUITE 244
GULFPORT MS 39501-2036~~

AVANT
222 N LASALLE ST STE 1600
CHICAGO IL 60601-1112

CKS PRIME INVESTMENTS LLC
PO BOX 2856
CHESAPEAKE VA 23327-2856

CAPITAL ONE
PO BOX 60599
CITY OF INDUSTRY CA 91716-0599

CAPITAL ONE BANK (USA) NA
BY AMERICAN INFOSOURCE AS AGENT
4515 N SANTA FE AVE
OKLAHOMA CITY OK 73118-7901

CAPITAL ONE NA
BY AMERICAN INFOSOURCE AS AGENT
CAPITAL ONE BANK USA NA
4515 N SANTA FE AVE
OKLAHOMA CITY OK 73118-7901

CREDIT ONE BANK
PO BOX 98878
LAS VEGAS NV 89193-8878

FINGERHUT
PO BOX 166
NEWARK NJ 07101-0166

FIRST PREMIER BANK
3820 N LOUISE AVE
SIOUX FALLS SD 57107-0145

FIRST TOWER LOAN LLC
PO BOX 320001
FLOWOOD MS 39232-0001

FRANKLIN COLLECTION SERVICES
2978 W JACKSON STREET
TUPELO MS 38801-6731

HATTIESBURG ORAL SURGERY
CO FRANKLIN SERVICE INC
PO BOX 3910
TUPELO MS 38803-3910

JACOB LAW GROUP
PO BOX 948
OXFORD MS 38655-0948

LVNV FUNDING LLC
200 MEETING STREET STE 206
GREENVILLE SC 29615-5833

LVNV FUNDING LLC
RESURGENT CAPITAL SERVICES
PO BOX 10587
GREENVILLE SC 29603-0587

MERRICK BANK
RESURGENT CAPITAL SERVICES
PO BOX 10368
GREENVILLE SC 29603-0368

MERRICK BANK
PO BOX 9201
OLD BETHPAGE NY 11804-9001

MILESTONE
PO BOX 4499
BEAVERTON OR 97076-4499

~~EXCLUDE~~

~~(D) (P)MS DEPARTMENT OF HUMAN SERVICES
ATTN BENEFIT RECOVERY UNIT
PO BOX 352
JACKSON MS 39205-0352~~

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~~EXCLUDE~~

~~(D) (P) MS DEPARTMENT OF HUMAN SERVICES
ATTN: BENEFIT RECOVERY UNIT
PO BOX 352
JACKSON MS 39205-0352~~

PREMIER BANKCARD LLC
JEFFERSON CAPITAL SYSTEMS LLC ASSIGNEE
PO BOX 7999
SAINT CLOUD MN 56302-7999

(P) PROFESSIONAL DEBT MEDIATION
7948 BAYMEADOWS WAY
2ND FLOOR
JACKSONVILLE FL 32256-8539

QUANTUM3 GROUP LLC AS AGENT FOR
CKS PRIME INVESTMENTS LLC
PO BOX 788
KIRKLAND WA 98083-0788

REPUBLIC FINANCE
CO C T CORPORATION SYSTEM
645 LAKE LAND EAST DRIVE STE 101
FLOWOOD MS 39232-9099

RONNESHIA HARPER
203 COLUMBIA STREET APT B
HATTIESBURG MS 39401-1901

SPRING OAKS CAPITAL SPV LLC
P O BOX 1216
CHESAPEAKE VA 23327-1216

(P) TOWER LOAN
P O BOX 320001
FLOWOOD MS 39232-0001

TOYOTA FINANCIAL SERVICES
PO BOX 15012
CHANDLER AZ 85244-5012

~~EXCLUDE~~

~~(D) TOYOTA MOTOR CREDIT CORPORATION
PO BOX 8026
CEDAR RAPIDS IA 52408-8026~~

~~EXCLUDE~~

~~UNITED STATES TRUSTEE
501 EAST COURT STREET
SUITE 6430
JACKSON MS 39201-5022~~

~~EXCLUDE~~

~~(D) UNITED STATES TRUSTEE
501 EAST COURT STREET SUITE 6430
JACKSON MS 39201-5022~~

VANESSA RUSSELL
13473 WARREN DRIVE
GULFPORT MS 39503-4529

NICHOLAS T GRILLO
GRILLO LAW FIRM
607 CORINNE STREET SUITE A3
HATTIESBURG MS 39401-3827

DEBTOR

RONALD L HARPER
13473 WARREN DRIVE
GULFPORT MS 39503-4529

~~EXCLUDE~~

~~(P) WARREN A CUNTEZ T1 JR
PO BOX 3749
GULFPORT MS 39505-3749~~